



Before the

**Department of Agriculture
Rural Utilities Service
Broadband Initiatives Program
RIN: 0572-ZA01**

And

**Department of Commerce
National Telecommunications and Information Administration
Broadband Technology Opportunities Program
RIN: 0660-ZA28**

**Joint Request for Information
Docket No. 0907141137-91375-05**

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Summary of Comments

In the Comments that follow, St. Louis Broadband, LLC presents the responses as one of the Round 1 applicants in response to the Joint Request for Information and recommendations for changes of policies for broadband stimulus grant and loan process and policies for Round 2.

St. Louis Broadband, LLC (STLBB) filed Easygrant #3159 dba the ShowMe Broadband Project. STLBB is also a member of the Wireless Internet Service Providers Association (WISPA). STLBB received a 'Letter of Support' from WISPA for the ShowMe Broadband Project (see Appendix A). STLBB supports the WISPA Joint Request for Information Docket No. 0907141137 91375-05, whereas otherwise noted.

Comments of St. Louis Broadband

St. Louis Broadband, LLC (STLBB) hereby comments on the second Joint Request of Information (RFI) of the Department of Commerce, National Telecommunications and Information Administration (NTIA) and the Department of Agriculture, Rural Utilities Service (RUS), published in the Federal Register on November 16, 2009 seeking public input regarding the second round of funding under the Broadband program (BIP) and the Broadband Technology Opportunities Program (BTOP).

WISPA's recommendations include the following:

- *"The application process should be reduced to one step, with many of the documents and due diligence materials submitted by applicants selected for funding as a condition to closing on funding.*
- *Those required attachments containing applicant certifications should be included in the on-line application itself, and applicants should be permitted to amend their applications after submission up until the filing deadline.*
- *Applicants should have at least 60 days from release of the Round 2 NOFA to prepare and submit their applications.*
- *NTIA should make clear that the states' role is to establish priorities and comment on those applications that promote those priorities, and should discourage conflicts of interest that arise when a state submits its own application.*
- *Census clocks should be retained as the baseline unit for proposed service areas, but the mapping process should be improved to ensure more efficient use of application preparation time and to promote accuracy.*
- *RUS grants should be available only to small entities, and applicants with higher revenues should be eligible only for loans. The matching component for applications proposing service to "unserved" areas should be reduced to ten percent.*
- *The agencies should disclose to the public more information about the applications.*
- *The outreach and support programs and communications should be improved, and inconsistencies in the application Guidelines should be eliminated.*

- *Service to last-mile end users should be the agencies' highest funding priority.*
- *Eligible applicants proposing to serve "unserved" areas should be (1) entitled to a priority if they are near or adjacent to the "unserved" area, (2) required to contribute only 10 percent of the project funding as a match, and (3) able to obtain funding for operating expenses in addition to broadband infrastructure costs. WISPA also urges NTIA and RUS to establish a priority for existing broadband providers with gross revenues of less than \$5 million.*
- *The definition of "remote" should be eliminated as a basis for funding.*
- *The Public Notice Response process can be vastly improved with greater transparency and disclosure in both the application and the response.*
- *The prohibition on sale of funded assets should be eliminated if certain safeguards are implemented. Likewise, the security requirements for RUS loans should be relaxed to encourage private investment in broadband projects.*
- *The agencies should eliminate the restrictions on use of program income to allow reinvestment in operating expenses and service expansion.*
- *The costs to acquire spectrum at auction or in the secondary market should be eligible for the portion applicable to the funded period.*
- *Funding should be available for operating expenses for "unserved" areas.*

These recommendations are discussed in detail in the accompanying Comments, and WISPA urges their adoption."

STLBB concurs with WISPA, with these following addendums:

- State involvement should be on the County Commissioner level.
- Last Mile applications with existing Middle Mile access/agreements are priorities to fund.
- Last Mile applications with Public Service networks are priorities to fund.
- The 20% waiver of matching funds of the network could be paid from the profit of the company. Company assets could be held as security, until paid in full.
- The 20% matching funds derived from the waiver would go directly into a community 'Technology Enrichment' Fund.
- County Commissioners of counties involved in the project would have oversight over the matching fund and have discretionary use as long as the expenditure would be 'broadband' related.
- Areas that do not include census blocks of cities of 20k+ population are not be used to define 'remote' and their 'mileage' (as defined for remote) cannot be used, as long as the applicants coverage area includes 'remote' areas by the original definition.
- New entities must have a proven track record of the technology that they propose to utilize.
- New entities must be organized in the State that they are proposing service.
- Public Notice of Service Area should be on the geographical area, rather than individual applicants.

These recommendations are discussed in detail in the accompanying Comments and STLBB urges their adoption in Round 1 and 2 by NTIA and RUS.

I. Introduction

STLBB is an SBA Woman Owned Small Business (WOSB). STLBB has been in the business of providing fixed wireless as a Wireless Internet Service Provider (WISP) in the metro St. Louis area since 2003. STLBB provides broadband service to businesses in unserved areas of St. Louis.

STLBB filed Comments in response to the Joint Request for Information for the first funding round.

In October 2007 we received a call requesting our company to provide broadband services to a small community south of St. Louis. Soon, another rural community heard about our capability, they wanted service as well. By spring of 2008, we had 5 counties that wanted broadband service. Our problem wasn't the customers; given the surprising demand, it was funding.

We contacted USDA/RUS in November of 2008 and asked when they were going to be funded again for their broadband loan and grant program. They informed us funding was expected to be made available 1 Q 2009. We continued with our planning in hopes that the expected funding could address our collective needs.

When the ARRA Stimulus Package 2009 was announced in February of this year, it was seen as a godsend for us here in rural Southeast Missouri. We had been doing our homework. We spent months in the planning phase working on:

- Path Analysis
- Equipment and Tower solutions
- Tower and Wind Turbine Engineering
- Spectrum Analysis
- Network and Path Engineering

To bring in good and reliable broadband a strong, well planned, redundant network is vital. *Of utmost importance, we have identified the upstream fiber providers in our proposed coverage area, as well as existing service providers.*

The priority of this network is to deliver high speed and reliable service to rural areas. However, our research has disclosed another critical part fixed wireless could play in determining the future of these communities. The coverage area for ShowMe Broadband is in one of the richest mineral areas of Missouri. In our coverage area there are 467 abandoned and working mines. Entire communities are built on these mines. The area lays in the New Madrid Fault zone, with the highest earthquake risk in the United States outside the West Coast.

Many of our counties are latent in deploying 911 services; our coverage would include two counties not now equipped with their own 911 emergency services. The potential for Future Earthquakes in a report filed in November 2008, the U.S. Federal Emergency Management Agency, (FEMA) warned that a serious earthquake in the New Madrid Seismic Zone could result in "the highest economic losses due to a natural disaster in the United States," further predicting "widespread and catastrophic" damage across Alabama, Arkansas, Illinois, Indiana, Kentucky, Mississippi, Missouri and Tennessee, where a 7.7 magnitude quake or greater would cause damage to tens of thousands of structures affecting water distribution, transportation systems, and other vital infrastructure¹ There is another potential Katrina-like situation being ignored in this region. ShowMe Broadband intends to address this problem by installing a ***FREE Public Safety network*** within their coverage area. This network will proactively address a potential disaster of catastrophic proportions.

Members of STLBB attended the NTIA/RUS workshops and viewed online webinars presented by the RUS and NTIA. STLBB believes that we have a clear understanding of the NOFA.

II. The Application and Review Process

A. Streamlining the Applications.

STLBB agrees with the WISPA position, that this process should be a one-step application.

STLBB further agrees with WISPA:

“In particular, the professional engineer certification should not be required as part of the application, but rather should be delivered by the applicant with respect to the detailed network design once selected for grant as a condition to closing on the funding instruments.”

We also agree that the environmental questionnaire requirement should be deferred until closing.

For a small business entity, the cost and time is significantly prohibitive for the above requirements and can put undue pressure on applicants.

B. New Entities.

STLBB feels that new entities that are formed for the sole purpose of applying for grant and/or loan monies that cannot submit historical financials could lead to abuse of the system. We feel the same issues would apply with resumes of key personnel.

We further believe new entities that enter into relationships with NTIA/RUS should have their formal agreements of partnership, incorporation and/or LLC for the same jurisdiction/State that they are organized and that they are requesting funding. We feel that this could be a further deterrent to new entities abusing funding.

The new entity should also have a track record for the technology that they intend on providing for their service area, i.e., if they propose using fiber than they must have a proven track record in deploying fiber.

We feel these steps, if included in the application process, should show a true and confident track record.

C. **Consortiums and Public-Private Partnerships**
STLBB agrees with WISPA:

“WISPA believes that information about each member’s proposed contributions and proof that the listed partners have agreed to partner are appropriate considerations. Requiring further information could be disruptive to the effort to form important partnerships involving multiple entities. For example, it would not be appropriate for the applicant to be required to include any financial information about each consortium member or partner.”

STLBB believes that it is important to have these relationships; however they should be on the appropriate government level. **While it is important to have Government support, support needs to be on the ‘County’ level.** This is where the true knowledge of what is required to make the project work exists. Also at this level, there truly is ‘first hand’ knowledge of broadband assets available to the community. STLBB recognized this in our Round 1 application. **We garnered the support of every County Commission that our service network covers. As demonstrated by Appendix B – N.**

D. **Specification of Service Areas.**
STLBB agrees with WISPA:

“WISPA wholeheartedly endorses the use of census blocks to define proposed funding areas. WISPA promoted this concept for Round 1 and continues to believe that census blocks provide the most granular level of data collection and thus helps ensure that funds can be targeted to locations that most need assistance.”

STLBB believes that this process does need to be streamlined. We spent several weeks working on data mining for the particular census blocks that we proposed to cover, only later to find that the NTIA/RUS had specific software to perform this task. In one case we had too many census blocks and had to use the one of three ‘Supplemental Information’ options to add additional information to our project. Had we been able to submit the information we had already gathered, it would have allowed us more time to focus on the application.

E. Relationship between BIP and BTOP.

STLBB agrees with WISPA:

“In the Round 1, the joint application could be confusing in some situations but on balance was probably a reasonable approach to reduce the amount of time required to complete the applications if one was applying to both funding sources. In addition, it would have been more confusing in public-private partnerships with two separate applications. However, for Round 2, WISPA believes that applicants proposing service to rural areas should not have to “fail” the BIP loan process in order to be considered for BTOP grants. Round 1 applicants that did not want to apply for loans were nevertheless required to submit information in an application just to show that RUS could not fund the proposal so it could be sent to NTIA.¹ This process also required both agencies to look at those applications, which unnecessarily increased the review time. Because of the tight award timelines in Round 1, both agencies evaluated the applications for entities filing for both BIP and BTOP funding whether or not BIP ended up rejecting the applicant. A compressed timeline is expected for the Round 2 as well, so it makes sense to give the applicant a choice as to which funding source the applicant prefers if both agencies are willing to fund the proposal. For Round 2, WISPA recommends that companies with total revenues above certain thresholds would not be eligible for RUS grants, but would only be eligible for RUS loans. RUS could designate revenue tiers that would establish a maximum amount of funds to be loaned, with larger entities being required to post more matching funds than smaller entities. Only applicants with revenues below a certain revenue level would be eligible for RUS grants. This approach would help ensure that more grant funds are available to smaller companies that are most in need of assistance.”

F. Transparency and Confidentiality

STLBB agrees with WISPA:

“WISPA believes that the public is entitled to more disclosure of information in BTOP and BIP applications. Other than financial and proprietary vendor cost information, which should remain confidential, all other aspects of the application should be made public so that the public can have a better sense as to how the government proposes to spend taxpayer dollars. If the agencies are not willing to require such full disclosure, at a minimum public notice of the executive summaries, open access obligations, lists of all census blocks and anchor institutions, system diagram/technical plan and management descriptions should be made public”

¹ It was also ironic that a Round 1 application for a rural area would potentially be forced to have only 50 percent grant funding while an application that either failed RUS’s requirements or was in a non-rural setting could get up to 80 percent grant funding.

G. Outreach and Support

STLBB agrees with WISPA:

“WISPA commends the efforts of NTIA and RUS in conducting workshops, issuing application guidelines, issuing responses to Frequently Asked Questions and establishing a Help Desk. In general, these programs worked effectively and provided transparency to the public.

WISPA offers a few suggestions for Round 2. First, the process of notifying registered potential applicants of changes or updates to the application process should be improved. Instead of relying solely on an on-line public notice, the agencies should also simultaneously broadcast e-mail notices of changes and updates to all registered potential applicants, thereby providing more certain and timely notice. A proactive notification system would have been especially important under the deadline conditions that existed when the application due date was extended for Round 1 and when the upload process faltered on the final due date.

Second, as described in the NTIA IG Letter, there were a few cases where the BTOP and BIP Guidelines were inconsistent with each other.² Greater care should be taken to ensure that the Guidelines are consistent with each other – perhaps publishing one set of Guidelines would have prevented this problem.

Third, while the FAQ responses were very helpful, they should have been published with greater frequency, and it should have been made clear at the time that there would be no further FAQ responses after the July 31 posting.

Fourth, because it was no doubt overwhelmed, the Help Desk sometimes took several days to respond, delaying the ability of applicants to move forward with the application process. If some of the questions commonly asked of the Help Desk had been answered as FAQ responses, perhaps there would have been less need at the Help Desk to provide the same answer to multiple potential applicants. All in all, the outreach and support mechanisms worked well, and with a few changes can work better in Round 2.”

H. NTIA Expert Review Policy

STLBB agrees with WISPA:

“WISPA does not believe it would be prudent to rely on unpaid experts as BTOP reviewers. WISPA believes that NTIA staff acquired sufficient knowledge in Round 1 to make funding decisions for Round 2. By contrast, the expert reviewers will need to be trained, at some time and expense, and WISPA believes

² See NTIA IG Letter at 5.

that many qualified individuals did not want to participate as reviewers because of the restrictions on future representation of applicants.”

III. Policy Issues Addressed in the NOFA.

A. Funding Priorities and Objectives.

STLBB agrees with WISPA:

“WISPA favors giving priority to applicants proposing to serve “unserved” areas that are located near their existing service areas. This will encourage consortiums and public-private partnerships. In reviewing the list of applicants for Round 1, it appears that many applications were filed by entities that have no existing relationship with the proposed funded service area. WISPA believes that eligible, existing, local broadband providers should be given a funding priority over qualified non-local applicants.”

STLBB believes that Small Business entities should receive preference over incumbents; bringing more competition to the market.

The 20%, or the 10% suggested by WISPA, matching funds could come in the form of a pledge for that same amount to be contributed to the local communities. This would establish monies for a ‘technology enrichment fund.’ These funds would be disbursed by local communities for public safety networks, broadband adoption, training, equipment upgrades for schools, libraries, community centers and tele-medicine programs, as well as contributing to the sustainability of broadband in the community.

The funds would come from the operating profits until paid in full and network assets could be held as security. This would enable small businesses the opportunity to participate in this program without the hardship of a major cash outlay Middle Mile “Comprehensive Community” Projects.

STLBB agrees with WISPA:

*“Whether the focus for Round 2 should be on funding middle mile projects depends in some respects on those projects that are funded in Round 1. **Nevertheless, WISPA believes that the emphasis in Round 2 should be on funding infrastructure for last-mile service to end users.***

*The ultimate objective of the broadband stimulus programs is to provide viable access to end users. Many regions of the country have middle mile fiber. But middle mile capacity often is **not** routed to where a last-mile user needs it, or the connectivity costs are not competitive and sometimes prohibitive. Middle mile fiber, for example, that connects key institutions is going to take the least expensive route to connect those institutions. It is not going to incur the expense*

of running to towers or meander through underserved communities – and middle mile connections near an “unserved” or “underserved” community is not sufficient.

In addition, the funding purpose is to actually get services to people who do not have access. Even when middle mile is available in an area, it is often not economically justifiable to provide last mile service; if it were practical or economically feasible without government funding, the services would typically already be available. Adding even more middle mile capacity does not solve this fundamental problem.

One suggestion is to have last mile providers “sign on” to middle mile projects. However, in our direct experience, this consists of “would you be against putting your name on this application as a last mile provider?” It is easy, and meaningless, to get a listing of potential last mile providers onto these middle mile projects unless a detailed engineering and financial plan has already been developed and provided with the application explaining exactly how the last mile services are going to be provided.”

STLBB believes that once a broadband program is established and the actual documented locations of the absent Middle Mile infrastructure is proven, then these applications could take priority over Last Mile.

In our experience in the Round 1 application we are seeing a lot of duplicating Middle Mile projects. While the projects have admiral goals of community support, these same projects are alienating the incumbent that has already invested in these service areas. Alienation from incumbents is not what this program is about, in our opinion. This will not encourage additional funding from existing providers in rural areas.

STLBB believes:

That the focus should be, for both stimulus rounds, on Last Mile that has existing Middle Mile presence. We believe that the intent of Congress was, when they crafted the American Recovery and Reinvestment Act of 2009, to get Broadband to the end-user in the most economic and expeditious way. Making Last Mile projects that have existing Middle Mile partners a priority of NTIA/RUS , we feel, will satisfy this requirement. *These are the projects that are truly ‘shovel ready’ and will get Americans back to work!*

STLBB believes that the Middle Mile provider must also be able to provide costs to last mile providers, such as, collocation costs and cost for bandwidth, prior to filing a joint application.

STLBB recently approached an organization that has a Middle Mile project application for the state of Missouri and they could not give us the costs of what it would be to collocate or the costs of bandwidth. We feel that this cost is just as imperative as the end-user costs. Without this provision Middle Mile projects can charge what they deem with no oversight and may not be competitive.

B. Economic Development.

STLBB agrees with WISPA:

“Though the thrust of the ARRA stimulus act is overall job creation and economic stimulus, it is not a productive use of time for an applicant, especially a small business, to estimate economic development impacts. If the service is needed, economic development will occur. There is no real way to ensure economic projections are anything but speculative and consume time better spent creating a stronger application.”

C. Targeted Population.

STLBB agrees with WISPA:

“Anyone who does not have broadband access doesn’t have access . . . it doesn’t matter if they are rich or poor, whether they live near a city or in the country. And if there is not access in this day and age, then there is almost certain to be an economic reason why there isn’t access yet. And the value to society of having them connected is just as strong. Social factors or geographical location should not be nearly as important as the simple question: is broadband access available?”

For example, a census block can easily have cable modem coverage along one bounding road while three other bounding roads have none and are not densely enough populated to ever get access. This can easily be in a non-rural area – yet it is just as important that these households get service as it is for anyone else, and it is just as unlikely they’ll ever get it outside of a grant. It is worth emphasizing that a middle mile project will never help them either – only a last mile investment can meet these needs.”

D. Other Changes.

STLBB agrees with WISPA:

“For Round 2, NTIA and RUS should retain the definition of “unserved area” and simplify the definition of “underserved area.” The definition in the Round 1 NOFA of “unserved area” appropriately considers the lack of availability of broadband service and the inability of consumers to readily subscribe to broadband service. The definition of “underserved” should be revised to eliminate the criterion that considers an area “underserved” if there is a broadband provider advertising speeds of 3 Mbps or more in the area. WISPA believes that the 50 percent availability and 40 percent subscription rates should be the sole factors used to determine whether an area is “underserved.”

This definitional change will make it easier for applicants to justify that an area is “underserved.” Instead of having to rely on inaccurate or incomplete data sets regarding subscription rates, they can simply identify the areas where broadband competition is present. Further, by retaining the existing definition, the agencies will be forced to assess Public Notice Responses that will be difficult to weigh against the applicant’s justification (even if the changes to the challenge process described below are implemented). With respect to the speed component, in nearly every area of the country that is not “unserved,” at least one broadband provider advertises those speeds, so it is believed that few applicants could make the case that this criterion applied. Further, using advertised speeds can yield misleading results, and using average or peak speeds would require verification by the agencies, a task they likely do not have time to perform.

WISPA proposes no changes to the definition of “broadband.” The definition utilized in Round 1 is reasonable. To change it now, after mapping projects are underway, would be disruptive to the mapping process as well as ongoing research that Round 2 applicants may be undertaking.”

“The requirements for Round 2 should favor projects proposing to serve “unserved” areas. WISPA proposes elsewhere in these Comments that eligible applicants proposing to serve “unserved” areas should be (1) entitled to a priority if they are near or adjacent to the “unserved” area, (2) required to contribute only 10 percent of the project funding as a match, and (3) able to obtain funding for operating expenses in addition to broadband infrastructure costs. Taken together, these benefits will improve the business case for funded service to “unserved” areas such that it will be more attractive for applicants to apply for these areas.

WISPA also urges NTIA and RUS to establish a priority for existing broadband providers with gross revenues of less than \$5 million. Smaller broadband providers generally are more in touch with their communities know precisely where the community's broadband needs are and, as such, represent a superior investment of federal dollars.

WISPA believes that the objective point system utilized for BIP is better than the subjective evaluation criteria used for BTOP. A point system enables applicants to have more certainty about the strength of their applications and provides the agencies with greater consistency in the way applications are compared."

STLBB agrees with WISPA and believes that "remote areas" should not be given special treatment for Round 2, as well as Round 1.

However if 'remote' definitions are required, STLBB believes that areas that do not include census blocks for funding of cities of 20k+ population are would not affect the definition, as long as 'remote' areas exist in their proposed coverage area. Remote areas should be able to take advantage of 100% BIP funding.

E. Program Definitions.

STLBB Agrees with WISPA:

"For Round 2, NTIA and RUS should retain the definition of "unserved area" and simplify the definition of "underserved area." The definition in the Round 1 NOFA of "unserved area" appropriately considers the lack of availability of broadband service and the inability of consumers to readily subscribe to broadband service. The definition of "underserved" should be revised to eliminate the criterion that considers an area "underserved" if there is a broadband provider advertising speeds of 3 Mbps or more in the area. WISPA believes that the 50 percent availability and 40 percent subscription rates should be the sole factors used to determine whether an area is "underserved."

This definitional change will make it easier for applicants to justify that an area is "underserved." Instead of having to rely on inaccurate or incomplete data sets regarding subscription rates, they can simply identify the areas where broadband competition is present. Further, by retaining the existing definition, the agencies will be forced to assess Public Notice Responses that will be difficult to weigh against the applicant's justification (even if the changes to the challenge process described below are implemented). With respect to the speed component, in nearly every area of the country that is not "unserved," at least one broadband provider advertises those speeds, so it is believed that few applicants could make the case that this criterion applied. Further, using advertised speeds can yield

misleading results, and using average or peak speeds would require verification by the agencies, a task they likely do not have time to perform.

WISPA believes that “remote areas” should not be given special treatment for Round 2. Although well-intentioned, very few areas qualified as “remote,” and thus very few applicants could take advantage of the 100 percent BIP grant funding mechanism. Substantively, the distance between an urban area and a “remote” proposed funded service is irrelevant – if the consumer cannot access broadband services wherever he or she may be, that should be sufficient for the area to qualify. The definition of “remote” should be eliminated as a basis for funding.

WISPA proposes no changes to the definition of “broadband.” The definition utilized in Round 1 is reasonable. To change it now, after mapping projects are underway, would be disruptive to the mapping process as well as ongoing research that Round 2 applicants may be undertaking.”

G. Public Notice of Service Area
STLBB agrees with WISPA:

“First, the application should not limit the number of characters an applicant can use to describe the methodology for determining whether an area is “unserved” or “underserved.” This will encourage applicants to do a better job of justifying why a particular area is entitled to funding.

Second, as noted above, the applicant’s methodology should be disclosed as part of the application made available for public review. This will not only encourage applicants to be more accurate, but will lead to fewer responses and, in cases where responses are filed, they will be more fact-based and thorough.

Third, a respondent should also be required to disclose its methodology for determining whether the area is “unserved” or “underserved.” If respondents know that their methodology will be made public, this might encourage more accuracy and credibility in the responses.

Fourth, the agencies should make clear that the “existing broadband provider” operates broadband facilities in the proposed funded service area at the time the application was filed. For instance, responses should not be permitted where the challenging party operates broadband facilities in other areas or where the respondent pledges to provide broadband service in the area at some future point in time. WISPA is aware that both of these examples arose during Round 1, and they should not be permitted to clog the system in Round 2.

Fifth, as suggested by the House Small Business Committee, NTIA and RUS should adopt a “formal process to reconcile conflicting data from an applicant and an existing broadband provider.”³ By allowing the applicant to question the broadband provider’s data, this will encourage the challenger to submit accurate information and thus inserts another check in the system to ensure that the agencies are making funding decisions with the most accurate information.

WISPA appreciates that Public Notice Response process has created delays and, because of the lack of quality in both applications and responses, will lead to difficult decisions. By implementing the above recommendations, WISPA believes the process will operate at a higher level for applicants, respondents and the agencies.”

STLBB also believes that this system should be changed to reflect the service coverage area not the applicant. In our experience in Round 1, we noted that while incumbents would PNR one application for a particular coverage area, they would not PNR a duplicate application in for the same coverage area.

STLBB painstakingly examined each county that we proposed coverage in and we believe that our maps are very specific to where incumbents currently provide service. We removed census blocks from our coverage maps where we knew that there was some type of broadband coverage Interconnection and Nondiscrimination Requirements.

H. Interconnection and Nondiscrimination Requirements

STLBB agrees with WISPA:

“WISPA agrees that NTIA and RUS should not make any changes to the interconnection and nondiscrimination requirements used for Round 1. The agencies should make clear that any funding recipient will agree to abide by the rules that the FCC adopts in its ongoing network neutrality proceeding.”⁴

However, STLBB believes that costs should be made public in the Round 2 application for interconnection, collocation and bandwidth costs, as Last Mile applicants have to make end-user costs public.

³ Letter dated November 17, 2009 from House Small Business Committee to Hon. Lawrence E. Strickling and Hon. Jonathan Adelstein (“Small Business Committee Letter”) at ____.

⁴ See Notice of Proposed Rulemaking, In the Matter of Preserving the Open Internet; Broadband Industry Practices, FCC 09-93 (rel. Oct. 22, 2009).

F. Sale of Project Assets.

STLBB agrees with WISP:

“The general prohibition on the sale or lease of funded broadband facilities⁵ is overly restrictive and, as noted by the House Small Business Committee, “creates a significant barrier” for WISPs and other small entities.⁶ In fact, in some cases, potential applicants elected to not participate in Round 1 because of this restriction. Those applicants that applied for funding recognized this prohibition as one of the biggest – if not these biggest – post-award restriction.

WISPA thus recommends that this prohibition be substantially revised to enable awardees to sell or lease funded broadband facilities at any time following the approval of funding if (a) the agreement is pursuant to an arms’ length business transaction under which the original grantee/borrower is not unjustly enriched, (b) the assignee or lessee agrees to be bound by the terms of the grant or loan agreements, and (c) the assignee or lessee is deemed to have the financial, management, operational and compliance experience necessary for the agencies to ensure that the infrastructure will be transferred to the new grantee/borrower and the project will be implemented and sustained as proposed in the application. The original applicant and the proposed assignee or lessee would file documentation with NTIA or RUS (as the case may be), and the agency would have a certain period of time (e.g., 30 days) to approve the transaction. To determine whether there is “unjust enrichment,” the agencies should ensure that the transaction does not value the funded broadband equipment at more than ten percent above its fair market value at the time of the transaction.

This change should apply not only to Round 2 awardees, but should also apply to Round 1 fund recipients. No party would be prejudiced since the change would remove a barrier and there is no policy reason to have two sets of post-award rules, one for Round 1 and one for Round 2.

In addition, WISPA strongly urges the agencies to modify the requirement that grants RUS a security interest in “all other assets of the applicant and any other signer of the loan documents that are available to be pledged to RUS.”⁷ WISPA agrees with the House Small Business Committee that this requirement discouraged applicants with existing loans, particularly small businesses, from filing in Round 1. Further, in cases where assets are owned free and clear, they

⁵ See Round 1 NOFA at lines 1731-41.

⁶ Small Business Committee Letter.

⁷ Round 1 NOFA at lines 1709-10.

would become encumbered and assets previously pledged as collateral would be subject to negotiation between RUS and previous lenders.⁸ In Round 1, applicants were forced to either spend precious time negotiating with existing lenders to take a subordinate position or forego filing altogether. Only facilities actually funded through an RUS loan should be pledged.

As recommended above with respect to restrictions on assignment or transfer of broadband facilities, the relaxation of the security requirements should apply to both Round 1 and Round 2 awardees. The change would remove a barrier, would not be prejudicial and would ensure that all borrowers are playing by the same set of rules.”

However in the case that the cost sharing waiver is applied for, these assets will be held as security till such time that the costs are paid in full to the communities.”

G. Cost Effectiveness.

STLBB agrees with WISPA:

“NTIA and RUS correctly state that the costs to build out a project will vary based on the circumstances, and rural companies – which include many WISPs – have much higher construction costs than companies operating in densely populated areas. This fact alone demonstrates why some areas of the country remain “unserved” or “underserved” – the costs to construct and operate are too high for any broadband provider to have served the area, and justifies the need for funding.

The question should not be framed in terms of absolute cost, but as a relative cost, i.e., do the infrastructure costs proposed by one applicant for a proposed area exceed by a certain percentage the costs proposed by another applicant for the same area. To ensure that costs are not overstated, the agencies should consider establishing and publishing a set of cost guidelines based on Round 1 projects and requires applicants for Round 2 to stay within those parameters unless they can demonstrate why higher costs are necessary.”

⁸ See Small Business Committee Letter. See also Round 1 NOFA at lines 1711-14 (granting RUS exclusive first lien position unless arrangements can be made with lenders).

H. Other.

STLBB agrees with WISPA:

“WISPA has several additional recommendations for Round 2. First, the agencies should relax the restrictions on the use of program income generated from the funded project. Under the Round 1 NOFA, “any program income generated by a proposed project during the grant period shall be retained by the grant recipient and shall be added to the funds committed to the project by RUS or NTIA and the recipient. The grant recipient should use program income to further eligible project objectives, including reinvestment in project facilities”⁹ As WISPA understands this requirement, awardees cannot reinvest any portion of their program income for operating expenses that could be used to maintain, expand or improve broadband service. For instance, under the Round 1 NOFA, wireless companies with relatively low capital expenses cannot obtain grant funding for recurring tower leases, electricity and middle mile access that are necessary to sustain service in “unserved” areas. WISPA questions the rationale of a requirement that prevents investment of program funds for ongoing operational expenses used to make the project more sustainable or for expansion of service to new areas. The agencies should not impose this restriction for Round 2, and should eliminate it with respect to Round 1 recipients, who would similarly benefit from the ability to reinvest income in operating expenses and service to new areas.”¹⁰

Second, the agencies should reverse their determination that the costs to acquire spectrum through an FCC auction or lease spectrum in a secondary market transaction are ineligible for BTOP or BIP funding.¹¹ This restriction is contrary to the technology neutral mandate of the Recovery Act¹² and unfairly prejudices companies seeking to rely on licensed spectrum, which serves the same purpose as fiber, cable and other broadband distribution technologies that are entitled to funding. Instead of an absolute bar, and to ensure that the government is not funding the cost of long-term spectrum use under a three-year funding program, NTIA and RUS should allow award funds to cover the portion of such spectrum acquisition and lease costs that are applicable to the three-year funding period. Thus, if the spectrum is leased for 30 years, only ten percent of the costs would be covered by the grant or loan.

⁹ *Id.* at lines 832-34 (emphases added) (income is defined as “gross income earned by the recipient that is either directly generated by a supported activity, or earned as a result of the award during the funding period”).

¹⁰ See also Small Business Committee Letter.

¹¹ See Round 1 NOFA at lines 781-82.

¹² See American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115, § 6001(e)(1)(C) (2009).

To the extent the Round 1 restriction on using grant or loan proceeds for spectrum is intended to ensure that RUS has adequate security, the eligibility of such costs should not be a concern. For spectrum leases, RUS could take a security interest in the spectrum lease agreement. For FCC licenses acquired at auction, RUS has existing authority under the FCC's 2004 Rural Order to obtain a security interest in FCC licenses as collateral for RUS loans, conditioned upon FCC approval of any transaction in which RUS seeks to foreclose on the license in question.¹³

Third, agency funding should be available for certain operating expenses as well as capital expenses in "unserved" areas. Such expenses could include marketing, training and installation. In these areas, especially given the higher costs to construct as well as operate broadband systems, limiting funding to capital expenses only may still be insufficient to show a sustainable project."

STLBB believes the program income should not only be to reinvest into the project, but be allowed to be used as operating capital as well.

¹³ See Facilitating the Provision of Spectrum-Based Services to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum-Based Services, *Report and Order and Further Notice of Proposed Rule Making*, 19 FCC Rcd 19078 (2004) ("Rural Order") at ¶¶47-58.

Appendix

Appendix A



P.O. Box 1592, Menard, Missouri, 62864

www.wispa.org

866-817-2851

July 31, 2009

Victoria Proffer
St. Louis Broadband

Dear Victoria,

WISPA (Wireless Internet Service Providers' Association) would like to congratulate St. Louis Broadband on its decision to apply for a BIP/BIP Grant. We would like to acknowledge that St. Louis Broadband is an active member and participant in our industry association. We also acknowledge that as a member, St. Louis Broadband has chosen to abide by the WISPA Code of Ethics. The objective of which states *"to maintain and enforce the highest standards of ethical professional practices that will make membership in the Wireless Internet Service Providers Association a recognized mark of experience, stability, integrity and competence."*

As a participant in WISPA, you have effectively communicated to our members, many times, how you have solved many challenges in providing Broadband Internet Access to many inhabitants of the St. Louis region your company serves. This communication is facilitated by WISPA and works as a two way street to assist our members on best practices in our industry. The information shared by the members has an overwhelming influence on individual operator success in this challenging industry. We appreciate all of the input you have provided. Without successful entrepreneurial operators like you, many citizens of the United States would still be unserved by Broadband.

We offer this letter of support based on our knowledge of your work ethic and embellish you (St. Louis Broadband) as a local broadband champion in your area. Good Luck in your Grant pursuits and please let us know the outcome so we can publicize your successes.

Respectively,

Rick Harnish
President
WISPA

Appendix B

BOLLINGER COUNTY COMMISSION
204 High Street, Suite 5
Marble Hill, MO 63764
Phone 573-238-1900 Ext. 5

Wayne Johnson
Presiding Commissioner

Larry VanGennip
1st Dist. Commissioner

Steve Jordan
2nd Dist. Commissioner

August 10, 2009

To Whom It May Concern:

Our community, like other small communities, lack access to high-speed Internet service; Therefore we are extending our support for ShowMe Broadband, a project of St. Louis, LLC application to the broadband stimulus program(s).

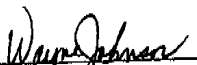
St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institution like education, healthcare and public safety. The service described in the proposal will provide significant benefit to our community.

We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs, and businesses.


We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you,


Wayne Johnson
Presiding Commissioner


Larry VanGennip
1st District Commissioner


Steve Jordan
2nd District Commissioner

UNOFFICIAL SUBMITTAL TO THE COMMISSION

Appendix C



Gerald W. Jones
Presiding Commissioner

Paul E. Koepfer
1st Dist. Commissioner

Jay C. Purcell
2nd Dist. Commissioner

Kara Clark
Clerk of Commission

Dunna Oldham
Administrative Assistant

COUNTY COMMISSION Cape Girardeau County, Missouri

July 30, 2009

To Whom It May Concern:

Our community, like other small rural communities, lack access to high-speed internet service; therefore, we are extending our support for Show Me Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

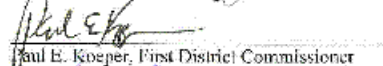
We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank You,


Gerald W. Jones, Presiding Commissioner


Paul E. Koepfer, First District Commissioner


Jay C. Purcell, Second District Commissioner

Cape Girardeau County Commission
1 Barton Square
Jackson, Missouri 64755
(573) 243-1052
FAX: 204-7493

Appendix D

AUG-10-2009 11:07A FROM:DENT COUNTY CLERK

573 729 3350

TO:15737474756

P.1

DENT COUNTY COMMISSION
400 N MAIN STREET
SALEM, MO 65560
573-729-3044

August 7, 2009

To Whom It May Concern:

Dent County, like other small rural communities, lacks access to high-speed internet services. The Dent County Commission is extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program.

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

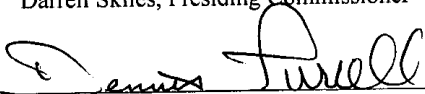
We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

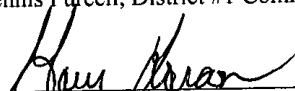
We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you
Dent County Commission


Darrell Skiles, Presiding Commissioner


Dennis Purcell, District #1 Commissioner


Gary Larson, District #2 Commissioner

Appendix E

TERRY W. NICHOLS
Presiding Commissioner
DUSTIN N. WALKER
Southern District Commissioner
BRADFORD V.S. JOHNSON
Western District Commissioner

IRON COUNTY COMMISSION
250 SOUTH MAIN STREET
P.O. BOX 42
IRONTON, MISSOURI 63650
(573)546-2140
FAX (573)546-6499

To Whom It May Concern:

Our community, like other small rural communities, lack access to high-speed internet service; therefore we are extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

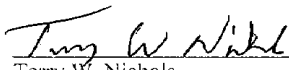
St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

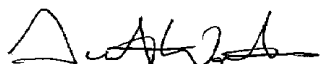
We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.


We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you.


Terry W. Nichols
Presiding Commissioner


Dustin N. Walker
Southern District Commissioner


Bradford V.S. Johnson
Western District Commissioner

Appendix F

MADISON COUNTY COMMISSION

#1 Court Square
Fredericktown, MO 63645

Dennis Bradford
First District

John Rauls
Presiding Commissioner

Larry Mungle
Second District

St. Louis Broadband
Attn: Victoria Proffer

Madison County, like other small and rural communities, lack access to high-speed internet service. The Madison County Commission is extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program.

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

We understand the need for community support for this project. In addition to providing more educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and constituents alike, our community will be better positioned to attract new residents and hopefully keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access to our county.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank You.

John E. Rauls
John E. Rauls
Presiding Commissioner
Madison County, MO

Appendix G

07/27/09

13:31

NO.005

001

Perry County Commission

Carl Leuckel, Jr., Presiding Commissioner
Patrick J. Heaps, 1st District Commissioner
James L. Sutterer, 2nd District Commissioner

Randy Taylor, County Clerk

321 N. Main Street, Suite 2
Perryville, MO 63775
Phone: 573-547-4242
Fax: 573-547-7367
perrycocommission@sbcglobal.net

To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed Internet service; therefore I am extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).


St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

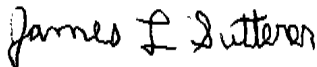
We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

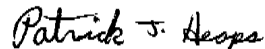
Thank you,



Carl Leuckel Jr.
Presiding Commissioner



James L. Sutterer
Commissioner 2nd District



Patrick J. Heaps
Commissioner 1st District

Appendix E

03/12/2007 04:29 5736482449

PAGE 02/02

REYNOLDS COUNTY COMMISSION

Reynolds County Courthouse * P.O. Box 10 * Centerville, MO 63633
Phone (573) 648-2494

DONALD BARNES
Presiding Commissioner

WAYNE HENSON
Commissioner 2nd District

DOUG WARREN
Commissioner 1st District

MIKE HARPER
County Clerk

July 24, 2009

To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed internet service; therefore we are extending our support for ShowMe Broadband, LLC application to the broadband stimulus program(s).

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

I understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

I support St. Louis Broadband's plan to pursue broadband stimulus funding.

Respectfully submitted,



Donald Barnes
Presiding Commissioner

CC/rh

Appendix I

SHANNON COUNTY COMMISSION

PO BOX 187
EMINENCE, MO 65466
Office (573) 226-3414
Fax (573) 226-5321

Northern Commissioner
Dale Counts

Presiding Commissioner
Tony Orchard

Southern Commissioner
Herman Kelly

County Clerk
Shelly McAfee

Deputy Clerk
Shelly Bland

July 27, 2009

To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed internet service; therefore I am extending my support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).


St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you.


Tony Orchard, Presiding Commissioner


Dale Counts, Northern Commissioner

Herman Kelly, Southern Commissioner

Appendix J

08/05/2009 09:30 FAX 573 431 6967

MARK HEDRICK COUNTY CLER

001



COUNTY COMMISSION OF ST. FRANCOIS COUNTY

(573) 756-3623 Ext. 6

1 WEST LIBERTY - SUITE 301
FARMINGTON, MISSOURI 63640
(573) 454-2040 Fax

(573) 431-6505 Ext. 6

BRET P. BURGESS
COUNTY COMMISSIONER 1ST DISTRICT

DAVID C. CRAMP
PRESIDING COMMISSIONER

PATRICK MULLINS
COUNTY COMMISSIONER 2ND DISTRICT

TO WHOM IT MAY CONCERN

Our community, like other small rural communities, lack access to high-speed internet services; therefore we are extending our support for Show Me. Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program.

St. Louis Broadband has proposed a plan that supports a local economic development by the proliferation and enablement of broadband access, including the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefits to our community.

We are aware of the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and to keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cramp", is written over a horizontal line.

David C. Cramp, Presiding Commissioner

Bret P. Burgess, First District Commissioner

A handwritten signature in black ink, appearing to read "Patrick Mullins", is written over a horizontal line.

Patrick Mullins, Second District Commissioner

Appendix K

07/27/2009 15:44 FAX 573 883 5312

COUNTY OF STE. GEN.

001



To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed Internet service; therefore I am extending my support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

I understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

I support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you.

Signature: _____

A handwritten signature in black ink, appearing to read "Albert J. Fults", written over a horizontal line.

Name and Contact: Albert J. Fults

Business / Organization (optional): Presiding Commissioner/Ste. Genevieve County

ShowMe Broadband is a project of
St. Louis Broadband, LLC

3

P: 314.974.5600
F: 573.747.4756
<http://www.stlouisbroadband.com>

Appendix L

07/29/2009 15:19

4179674080

TEXAS CO COMMISSION

PAGE 02



Texas County Commission

210 North Grand
Houston, Missouri 65483
417-967-3222
FAX 417-967-8040



John Casey
Associate Commissioner
District One

Donald E. Shelhammer
Presiding Commissioner

Linda L. Garrett
Associate Commissioner
District Two

July 29, 2009

To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed Internet service; therefore we are extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

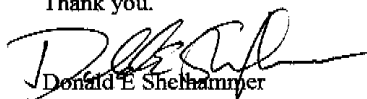
St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

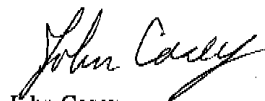
We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

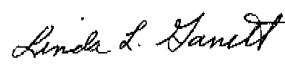
We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you.


Donald E. Shelhammer
Presiding Commissioner


John Casey
Associate Commissioner


Linda L. Garrett
Associate Commissioner

"Missouri's Largest County"

Appendix M

08/11/2009 09:40

5734384038

WASH CO CLERK

PAGE 02/02

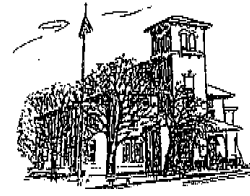


TODD MOYERS
COMMISSIONER
1ST DISTRICT

WASHINGTON COUNTY COMMISSION

102 North Missouri Street
Potosi, Missouri 63664
(573) 438-4346
FAX (573) 438-4038

ROBERT (BOB) REED
PRESIDING COMMISSIONER



RANDY O'NEAL
COMMISSIONER
2ND DISTRICT

August 11, 2009

To Whom It May Concern:

Our community, like other small and rural communities, lack access to high-speed Internet service; therefore I am extending my support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.

I understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband Internet access in our community.

I support St. Louis Broadband's plan to pursue broadband stimulus funding.

Thank you,

Robert Reed,
Presiding Commissioner

Appendix N

07/29/2009 15:06 FAX 573 224 5609

WAYNE CO CLERK

002

BILL HOVIS
Commissioner Eastern District

BRIAN M. POLK
Presiding Commissioner

Chad Henson
Commissioner Western District

WAYNE COUNTY COMMISSION

NEW PHONE #
573-224-5600 Ext. 4

P. O. BOX 48 • GREENVILLE, MISSOURI 63944 • Phone: 573-224-3010

July 29, 2009

To Whom It May Concern:

Our community, like other small and rural communities, lacks access to high-speed internet service; therefore we are extending our support for ShowMe Broadband, a project of St. Louis Broadband, LLC application to the broadband stimulus program(s).

St. Louis Broadband has proposed a plan that supports a local economic development and enhancement by the proliferation and enablement of broadband access, including to the core institutions like education, healthcare and public safety. The services described in the proposal will provide significant benefit to our community.


We understand the need for community support for this project. In addition to bettering our educational opportunities, access to healthcare resources, telecommuting, online government and community resources and overall improved ability to keep in touch with loved ones and clients alike; our community will be better positioned to attract new and keep existing residents, jobs and businesses.

We look forward to working together in the creation and deployment of affordable, quality broadband internet access in our community.

We support St. Louis Broadband's plan to pursue broadband stimulus funding.

I am writing this on behalf of the Wayne County Commission upon their direction.

Thank You,



Alan R. Lutes
Wayne County Clerk
and Clerk of the Wayne County Commission